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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

AMERICAN STEAMSHIP OWNERS MUTUAL  
PROTECTION AND INDEMNITY  
ASSOCIATION, INC.,

Plaintiff,

-against-

ALCOA STEAMSHIP CO., INC., et al.,

Defendants.

ECF CASE

Case No. 04 CV 4309 (LAK)

Defendant KeySpan Corporation's Joinder  
In The Memorandum Filed By Certain  
Defendants In Opposition to the Maritime  
Claimants' Motion To Intervene

**DEFENDANT KEYSpan CORPORATION'S JOINDER IN THE  
MEMORANDUM FILED BY CERTAIN DEFENDANTS IN OPPOSITION  
TO THE MARTIME CLAIMANTS' MOTION TO INTERVENE**

KeySpan Corporation ("KeySpan") respectfully joins in the memorandum filed by certain defendants (Keystone Shipping Company, et al.) in opposition to the maritime claimants motion to intervene filed in the above- captioned case. The arguments and reasoning underlying *The Memorandum In Opposition To The Maritime Claimants' Motion to Intervene* filed with this Court on October 12, 2004, are equally applicable to KeySpan. KeySpan has reviewed *The Memorandum In Opposition To The Maritime Claimants' Motion to Intervene* and KeySpan adopts and incorporates by reference all of the arguments and reasoning. Accordingly, KeySpan

joins *The Memorandum In Opposition To The Maritime Claimants' Motion to Intervene*.

Dated: New York, New York  
October 12, 2004

DICKSTEIN SHAPIRO MORIN &  
OSHINSKY LLP

By: S/  
Stacey A. Saiontz (SS-1705)  
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